

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,
Plaintiff,**

v.

**The City of Nashua, *et al.*,
Defendants.**

Civil Action No. 1:22-cv-00326-LM

**AMENDED EXHIBIT LIST OF THE DEFENDANTS,
STEVEN A. BOLTON AND CELIA K. LEONARD**

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following amended exhibit list for trial:

Trial Ex.	ID	Date	Description
A		9/11/19	Plaintiff email to Leonard “Clarification of the Legal Office Function” (K) ¹
B		6/25/20	Classic Signs, Inc. invoice for “By Appointment Only” sign (S)
C	ID	2021	Timeline (W)
D		1/21-1/22/21	Email from Plaintiff to Vincent, et al. re “Totally Unfair Abatement Process” (X)
E	ID	1/22/21	Email from Plaintiff to Vincent re: “Here are the abatements signed” (Y)
F		1/23/21	Union Leader Article re: Nashua woman escorted out of Nashua City Hall by police (AA)
G		2/22/21	Ortolano Facebook post: Good Governments Don’t Do This (JJ)

¹ As a convenience to counsel, the exhibit letter from defendants’ original exhibit list is set forth in parenthesis for reference only. The Court may ignore this reference.

H		3/26/21	Granite Grok article by Ortolano re: Nashua's Right Not-to-Know (QQ)
I		4/18/21	Ortolano Facebook post on The Nashua Scoop re: Kleiner emails (SS)
J		4/26/21	Excerpt of Budget Review Committee meeting minutes (TT)
K	ID	4/26/21	Email from Ortolano to Bolton, et al. re: Comments in non-public session made about Spitting (UU)
L	ID	4/26/21	Granite Grok post re: Update on Right to Know Lawsuit against Nashua City Hall (VV)
M		4/27/21	Email from Ortolano to Bolton, et al. re: Bolton has no ethics (WW)
N		4/28/21	Ortolano post on goodgov.org re: A Story About a Crooked Mayor (XX)
O		4/29/21	Ortolano Facebook posts with comments about Attorney Leonard and Ortolano's trespass (YY)
P	ID	4/30/21	Ortolano post on Granite Grok re: Is Nashua City Right to Know Coordinate Jesse Neumann Just Playing word Salad in his RTK Responses? (ZZ)
Q	ID	4/30/21	Email from C. Linder to Nashua Legal Department re: Eliminate the RTK position in the legal office (AAA)
R	ID	5/3/21	Email from Ortolano to Jesse Neumann, et al. re Your recent RTK request dated April 26, 2021 (CCC)
S	ID	5/10/21	Ortolano post re: Right to Know Demand Made for Selected Nashua City Emails (DDD)
T		5/11/21	Ortolano post on goodgov.org re: Attorney Bolton Continues to Obstruct Public Information (EEE)
U	ID	6/1/21	Ortolano post on Granite Grok re: Harassment Warning Requested Against Nashua's Mayor Donchess, Director Kim Kleiner, and Attorney Bolton (LLL)
V	ID	6/23/21	Email from Ortolano to Board of Alderman, et al. re: Last Night's shocking Board of Alderman Meeting (TTT)
W	ID	6/24/21	Ortolano post on Granite Grok re: Nashua Should be Ashamed of its Attorney Bolton (UUU)

X		7/3/21	Ortolano post on goodgov.org re: The Broken Nashua Court System (ZZZ)
Y		7/19/21	Ortolano Facebook post on The Nashua Scoop re: tension between Attorney Bolton and Alderwoman Lu (CCCC)
Z		7/22/21	Ortolano post on goodgov.org re: Deputy Attorney Leonard's Misrepresentations (DDDD)
AA	ID	7/22/21	Ortolano Facebook post on The Nashua Scoop re: Attorney Leonard's misrepresentation (EEEE)
BB	ID	7/22/21	Email from Ortolano to D. Graham, et al. re: My Arrest in City Hall (FFFF)
CC	ID	7/23/21	Ortolano post to Granite Grok re: It's a Bad Look to Arrest Citizens in City Hall (GGGG)
DD		8/3/21	Ortolano post to goodgov.org re: Bolton ignores Court order to drive-up Legal Fees (KKKK)
EE		8/4/21	Excerpt of Report of the Finance Committee meeting minutes (LLLL)
FF		8/23/21	Excerpt of Budget Review Committee meeting minutes (QQQQ)
GG	ID	8/26/21	Excerpt of Public Minutes of Board of Assessors Meeting minutes – Ortolano public comment (TTTT)
HH	ID	8/26/21	Board of Assessors Meeting – video of Ortolano public comment (UUUU)
II	ID	8/30/21	Email from Ortolano to Board of Aldermen, et al. re: The Mayor's sanctioned abuses of the Nashua Legal Office (VVVV)
JJ	ID	8/31/21	Ortolano post to goodgov.org re: Mayor Donchess' Sanctioned Abuses of the Nashua Legal Office (WWWW)
KK	ID	8/31/21	Ortolano post to Granite Grok re: Our Board of Aldermen Have Become the Mayor's Posse (XXXX)
LL		12/15/21	Ortolano post Granite Grok re: Nashua's Thug Leadership (HHHHH)
MM		01/16/22	Ortolano post to Granite Grok re: Nashua City Attorney Steve Bolton is Unfit for Duty (IIIII)

NN	ID	1/22/21-4/1/22	Chart of Right-to-Know Requests Filed by Ortolano (Q)
OO	ID	7/18/22	Plaintiff comments at Nashua Board of Alderman meeting (E)
PP	ID	7/20/22	Plaintiff comments at Nashua Finance Committee meeting (F)
QQ	ID	8/27/22	Plaintiff blog post “The Colossal Stupidity of the Nashua Legal Office” (B)
RR		11/28/22	Plaintiff email to Nashua city officials (D)
SS	ID	3/4/24	Plaintiff email to Nashua city officials titled “The Notable Moronic Response from the Nashua’s Premier Attorney – Leonard” (J)
TT		5/8/24	Nashua police department photos (M)
UU			Photos of City Hall (Photos 1-5 only) (P)
VV	ID		Sketch of Legal Department (V)
WW	ID		Megan Caron Compilation of Plaintiff’s Board Attendance (LLLLL)

The defendants Bolton and Leonard reserve the right to revise and supplement this Amended Exhibit List through the time of trial.

Respectfully submitted,

STEVEN A. BOLTON,

By his Counsel,

UPTON & HATFIELD, LLP,

Date: June 9, 2025

/s/ Russell F. Hilliard

Russell F. Hilliard; NHBA #1159
159 Middle Street
Portsmouth, NH 03801
(603) 436-7046
rhilliard@uptonhatfield.com

Brooke Lovett Shilo; NHBA #20794
Madeline K. Matulis; NHBA #276135
10 Centre Street; PO Box 1090
Concord, NH 03302-1090
(603) 224-7791
bshilo@uptonhatfield.com
mmatulis@uptonhatfield.com

and

CEILA K. LEONARD

By her attorneys

**CULLEN COLLIMORE SHIRLEY,
PLLC,**

Dated: June 9, 2025

/s/ Brian J.S. Cullen

Brian J.S. Cullen (Bar No. 11265)
37 Technology Way, Suite 3W2
Nashua, NH 03060
(603) 881-5500
bcullen@cullencollimore.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded on this day to all counsel of record through the Court's E-filing system.

/s/ Russell F. Hilliard

Russell F. Hilliard